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*Attorneys for Plaintiff Jonathan D. Rubin
in Rubin v. Facebook, Inc., et al.,
18-cv-01852-EMC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CASE NO. 3:18-CV-01732-VC

LAUREN PRICE, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC, and CAMBRIDGE
ANALYTICA, LLC

Defendants.

**DECLARATION OF NICHOLAS A.
CARLIN IN SUPPORT OF PLAINTIFF
JONATHAN D. RUBIN'S RESPONSE IN
SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

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Under 28 U.S.C. § 1746, I, Nicholas A. Carlin, declare as follows:

1. Pursuant to Civil Local Rule 7-11, I submit this declaration in support of Plaintiff Jonathan D. Rubin's Resonse in Support of Plaintiff Theresa Beiner and Brandon Haubert (plaintiffs in *Beiner, et al. v. Facebook, Inc., et al.*, No. 3:18-cv-1953 (N.D. Cal., Filed March 29, 2018)) Administrative Motion to Consider Whether Cases Should be Related. If called to testify as a witness, I could and would competently testify to the matters stated herein.

2. I am a partner of the law firm Phillips, Erlewine, Given, & Carlin LLP, counsel for Plaintiff Johnathan D. Rubin, who filed a consumer class action and RICO complaint on March 26, 2018 in the United States District Court for the Northern District of California in *Rubin v. Facebook, Inc., et al.*, No. 18-cv-01852-EMC. That case is currently assigned to Judge Edward M. Chen in the San Francisco division of this District.

3. I have reviewed the complaints filed in *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20, 2018); *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891 (filed March 27, 2018); *O'Kelly v. Facebook, Inc., et al.*, Case No. 3:18-cv-01915 (filed March 28, 2018); *Beiner, et al. v. Facebook, Inc., et al.*, No. 3:18-cv-1953; and *Haslinger v. Facebook, Inc., et al.*, Case No. 4:18-cv-01984 (filed March 30, 2018). The cases appear to be related because they concern the same or similar parties, i.e., Facebook, Inc. ("Facebook") and Cambridge Analytica, LLC ("Cambridge"), and arise from the same or similar facts and transactions. Specifically the cases allege that Cambridge stole the private user data of over 50 million Facebook users without their consent and that this theft was facilitated by Facebook's inadequate and misleading privacy and data security policies which allowed third parties to access Facebook users' personal data without their consent. Cambridge then used the stolen personal information to manipulate United States elections, including the 2016 presidential election.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 2, 2018 in San Francisco, California.

/s/ Nicholas A. Carlin

Nicholas A. Carlin